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March 30, 2001

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Ms. Deena Sheppard-Johnson, SR-6J
Enforcement Specialist
Remedial Enforcement Support Section
Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: Notice Letter and Information Request dated March 2, 2001 re the
Chemical Recovery Systems Site in Elyria, Ohio

Dear Ms. Sheppard-Johnson,

I am writing on behalf of our affiliated company, Clestra Hauserman, ("Clestra") located in Solon, Ohio, in response to the notice letter referenced above. The letter was addressed to E.F.Hauserman and Clestra at the latter's business address in Solon, Ohio. As we discussed earlier today, I am submitting this response to the General Notice and would like to confirm your agreement to an extension to April 30 to respond to the Information Request.

Future EPA Notification

Please direct future communications regarding Clestra to me at the address below.

PRP Determination

It is Clestra's intention to cooperate with the U.S. Environmental Protection Agency ("EPA") provided that Clestra is properly identified as a Potentially Responsible Party ("PRP") and to cooperate with EPA to reach a determination on that question. However, at this point, Clestra objects to the determination by EPA that it should be considered a PRP for the Chemical Recovery Systems Site and this response does not constitute an admission of any fact or liability or a waiver of any argument or defense. As we discussed today, our initial review indicates that Clestra is not a successor in interest to the E.F.Hauserman entity that allegedly used the Chemical Recovery Systems Site during the relevant

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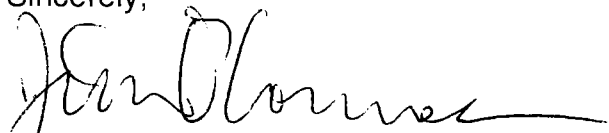
period of the 1960's to 1970's. Moreover, we do not have information confirming E.F. Hauserman would be liable. We are continuing our efforts to gather documents to confirm the nature of the relationship, if any, between these companies. Until we have had an opportunity to fully examine the available records, we reserve the right to supplement our response, including these objections. If the records and other information do confirm that Clestra is responsible for contributing to contamination at the Site, we will of course continue to fully cooperate with EPA in its efforts to address the situation.

Information Request

Based on our initial review of partial documentation, it appears that other entities retain any liability for E.F.Hauserman activities during the relevant period. We would like to complete our review of those records, which may include obtaining documentation from the former E.F.Hauserman parent company that is located in France. Because of the difficulties in getting these documents, I have requested that our time to respond to the Information Request be extended to April 30 and we understand that EPA agrees to that extension.

Please let me know if you have any questions or comments concerning this response.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim O'Connor", with a long horizontal flourish extending to the right.

Jim O'Connor
Senior Corporate Counsel
Phone: 616-247-3336 Fax: 616-246-4068